

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RADHIKA VEGESNA, Personal	:	
Representative of the ESTATE	:	
OF RAJESH PADMARAJU, Deceased	:	
Plaintiff	:	
	:	
VS.	:	NO. 03-295 ERIE
	:	
ISD TRANSPORTATION COMPANY,	:	
INC., MANDEEP SINGH, SAMINDER	:	
SINGH, and SAMINDER SINGH,	:	
d/b/a ISD TRANSPORTATION	:	
COMPANY, INC., Defendants	:	
	:	
RADHIKA VEGESNA, Personal	:	
Representative of the ESTATE	:	
OF RAJESH PADMARAJU, Deceased	:	
Plaintiff	:	
	:	
VS.	:	NO. 03-317 ERIE
	:	
SAMINDER SINGH and SAMINDER	:	
SINGH, d/b/a ISD	:	
TRANSPORTATION COMPANY, INC.,	:	
Defendants	:	

PLAINTIFF'S REQUESTS FOR
PRODUCTION OF DOCUMENTS
DIRECTED TO DEFENDANT, MANDEEP SINGH

AND NOW comes the Plaintiff, RADHIKA VEGESNA, Personal Representative of the ESTATE OF RAJESH PADMARAJU, Deceased, by her counsel, ANDREW J. CONNER of CONNER RILEY & FRYLING, 17 West Tenth Street, P.O. Box 860, Erie, Pennsylvania 16512-0860, and submit the following Requests for Production of Documents upon the Defendant, ISD TRANSPORTATION COMPANY, INC., requiring responses within thirty (30) days after service in accordance with Rule 34 of the Federal Rules of Civil Procedure, as follows:

- 1) Please produce and permit inspection and copying of all writings, memorandums, documents, files and other compilations of

data and information, which information can be obtained and which information is in the possession, custody and control of Defendant, with the exception of any portions thereof which would disclose the mental impressions of his attorneys, their conclusions, opinions, memorandum, notes or summaries, legal research or legal theories and with the exception of any portions thereof which would disclose the mental impressions, conclusions or opinions reflecting the value or merit of a claim or defense or respective strategy or tactics of a representative of Defendant, other than attorney, which relate to the subject matter involved in this action including, but not limited to:

(a) Copies of any commercial driver's licenses which you were issued by any country, state or governmental unit;

RESPONSE:

(b) A copy of the driver's license you provided to the Pennsylvania State Police immediately following the October 5, 2001 fatal collision giving rise to this action;

RESPONSE:

(c) A copy of any VISA issued to you by any government allowing for your entry into the United States;

RESPONSE:

(d) A copy of any "Green Card" issued by the United States Immigration and Naturalization;

RESPONSE:

(e) A copy of any "road test" which indicates you were qualified to operate a commercial tractor-trailer as of October 5, 2001;

RESPONSE:

(f) Copies of monthly billing statements for the months of September, October and November, 2001 applicable to any cell phone in your possession, custody and control and/or which was in the tractor-trailer he was operating on October 5, 2001.

RESPONSE:

Respectfully submitted,

CONNER RILEY & FRYLING

BY Andrew J. Conner
ANDREW J. CONNER, ESQUIRE
ATTORNEY FOR PLAINTIFF
17 West Tenth Street
P.O. Box 860
Erie, PA 16512-0860
(814) 453-3343

DATED: December 2, 2004.